

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG
APR 29 2011
MA
Per. MICHAEL E. D'ANDREA, CLERK
Deputy Clerk

In re: Criminal Complaint) NO. 1:11-MJ-067
)
) (MAGISTRATE JUDGE CARLSON)
)
) (UNDER SEAL)

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file this Motion and the following documents under seal:

- | | |
|--|--|
| <input type="checkbox"/> Indictment | <input type="checkbox"/> Complaint |
| <input checked="" type="checkbox"/> Complaint, Arrest Warrant, and Affidavit | <input type="checkbox"/> Search Warrant, Application and Affidavit |
| <input type="checkbox"/> Arrest Warrant | |

1. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

- ☒ The arrest of the Defendant(s);
- ☐ Further Order of Court; or
- ☐ Written notification by the United States that these pleadings no longer need to remain filed

under seal; or

☐ _____

2. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

☒ Preserve the integrity of this ongoing case;

☒ Ensure the safety of investigative personnel;

☐ Protect the identity of potential witnesses;

☐ Allow for the seizure of evidence;

☒ Permit the arrest of those charged with violations of federal criminal laws; or

☐ _____

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

PETER J. SMITH
United States Attorney

/s/ James T. Clancy
JAMES T. CLANCY
Assistant U.S. Attorney

Date: April 29, 2011